#### UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS **AUSTIN DIVISION**

T 1	-	
1 /	v	ы.
111	_ I \	. I ') .

Case No: <u>24-10303-SMR</u> HOT CRETE, LLC Chapter 11

MOTION FOR ADMISSION PRO HAC VICE
TO THE HONORABLE JUDGE OF SAID COURT:
Comes now Robert Mangum ("Applicant") moves
this court to grant admission to the United States Bankruptcy Court for the Western
District of Texas <i>pro hac vice</i> to represent Ansar Chmeis in this case,
and would respectfully show the Court as follows:
1. Applicant is an attorney and a member of the law firm (or practices under the
name of)
D'Amura & Zaidman, PLLC
with offices at
Mailing address: 609 Josephine Street
City, State, Zip: Austin, TX 78704
Telephone: 803-622-9526 Fax:
Email Address:rmangum@dz-pllc.com
2. SinceNovember 30, 2018, Applicant has been and
presently is a member of and in good standing with the Bar of the State of
Georgia Crrnecpyu''dct'hegpug''pwo dgt'ku''268222aaaaaaaaaaaaaaaaaaaaa

3. Applicant has been admitted to practice before the following state a		ore the following state and federal		
	courts:			
	Court:		Admission date:	
	See attached			
		-		
		-		
4.	Applicant is presently a member in good standing of the bars of the courts listed			
	above, and is not currently suspended or disbarred in any other court, except as			
	provided below (list any court named in the preceding paragraph before which			
	Applicant is no longer admitted to pract	ctice):		
	NA			
5.	Applicant has never been subject to gr	ievan	ce proceedings or involuntary removal	
	proceedings while a member of the l	oar of	any state or federal court, except	
	as provided below:			
	NA			
6.	Applicant is eligible to practice in the E	Bankr	uptcy Court.	
7.	Applicant has read and is familiar with	the L	ocal Rules of the Western District of	

Texas Bankruptcy Court and is also subject to all rules of practice of the U.S. District

Court of the Western District of Texas and will comply with the standards of practice

set out therein.

	8. • Applicant has not requested admission pro hac vice in the Bankruptcy				
	Court for the Western District of Texas in the preceding twelve months.				
	or				
	Applicant has f	iled the motions for	admission pro hac vice in the		
	preceding twelve mont	hs.			
	Case Name/Number	Date Filed	Disposition of Motion		
admis		orays that this Court	enter an order permitting the to the U.S. Bankruptcy	,	
Court W	R Vestern District of Texas				
NB: Co	unsel for debtor has indi	cated Debtor does no	ot oppose this application for adm	ission <i>pro hac vice</i> .	
Mr. Ma	ngum proposes to serve		l to Ms. Lydia Zaidman for credit	or Ansar Chmeis.	
		Respe	etfully submitted,		
		<u>/s/ R</u>	obert Mangum ature of Applicant]		
		[Signo			
		   [Drint	Robert Mangum ed name of Applicant		
		[I IIIIt	ed name of Applicant		
		<u>1119 -</u> [Addr	Trinity Pl., North Augusta, SC 2986 ess of Applicant]	0	
			622-9526		
		[Telep	phone of Applicant]		
			gum@dz-pllc.com l address of Applicant]		

## **CERTIFICATE OF SERVICE**

I hereby certify that I have s	served a true and correct copy of this motion
upon each attorney of record and the origin	nal upon the Clerk of Court on this the <u>26th</u>
Day of February , 2025	<del>.</del>
Note: Per Local Rule 9013(c)(2) the	/s/ Robert Mangum
certificate of service must list each of the entities served and their addresses.	[Signature of Applicant]
Attach a list below of each party served	Robert Mangum
along with the service address and the method of service.	[Printed name of Applicant]
	1119 Trinity Pl., North Augusta, SC 29860
	[Address of Applicant]
	803-622-9526
	[Telephone of Applicant]
	rmangum@dz-pllc.com
	[Email address of Applicant]

### **Bar and Court Admissions of Robert Mangum**

GA State Courts: Nov 2018 SC State Courts: May 2019 NC State Courts: May 2021

Northern District of GA: April 2019 Southern District of GA: July 2019

Northern District of GA Bankruptcy: August 2019 Southern District of GA Bankruptcy: January 2020

District of South Carolina: May 2021

District of South Carolina Bankruptcy: January 2022

Eleventh Circuit: June 2022 Supreme Court: December 2023

# **Creditors**

Arcosa Aggregates Texas, LLC PO Box 911205 Dallas, TX 75373-1205	(18641094) (20)
Capital One Spark Business P.O. Box 60519 City of Industry, CA 91716-0519	(18641104) (20)
CEMEX Construction Materials South, LLC 10100 Katy Freeway, Ste 300 Houston, TX 77043-5267	(18641106) (20)
Central Texas Regional Mobility Authority 3300 N IH-35, Suite 300 Austin, TX 78705	(18641107) (20)
CHANAS AGGREGATES, LLC 7850 E. State Hwy. 29 Llano, TX 78643	(18641108) (20)
Express Materials Services, LLC 556 S HWY-95 Elgin, TN 78621	(18641123) (20)
Federated Mutual Insurance Company 9001 Airport Fwy Suite 500 North RIchland Hills, TX 76180	(18641125) (20)
Fleetistics 15310 Amberly Dr., Suite 250 Tampa, FL 33647	(18641127) (20)
Hasten Energy Solutions 405 N Post Oak Ln Houston, TX 77024-5913	(18641133) (20)
Hill Country Electric Supply 3003 N. E. LOOP 410, SUITE 101 San Antonio, TX 78218	(18641134) (20)
Hillard Dozer, LP 12495 Reeds Lake Loop Temple, TX 76501	(18641135) (20)
<b>Liberty Hill Truck Service</b> 12830 TX-29 Liberty Hill, TX 78642	(18641155) (20)

#### 24-10303-smr Doc#181 Filed 02/26/25 Entered 02/26/25 13:17:33 Main Document Pg 7 of

Martin Marietta Materials, Inc.
PO BOX 677061

Dallas, TX 75267-7061

(18641156)
(20)

Oscar Carreon
201 Lollipop Ln
Cedar Park, TX 78613
(18641165)
(20)

**Texas Department of Transportation**12719 Burnet Road
Austin, TN 78727
(18641183)
(20)

Texas Enterprises. Inc. dba Allied Sales Company
5005 E 7th Street
Austin, TX 78702
(18641184)
(20)

**Texas Lehigh Cement Company, LP**P.O. Box 736821 (18641186)
Dallas, TX 75373-6821 (20)

WEX Inc.
1 Hancock Drive
Portland, ME 04101
(18641198)
(20)

WW Air Compressor
402 Burleson St
Smithville, TX 78957
(18641199)
(20)

Todd Headden Hayward PLLC 7600 Burnet Road, Suite 530 Austin, TX 78757 Counsel for Debtor Hot Crete, LLC